VpAC Vibrio Rule Development Meeting
May 22, 2014

Attendees

In Person: Bill Dewey, Bo Ingham, Cari Franz-West, Darin Klein, Darrell Moudry, Dave Steele, Gordon Martinen, Hilary Browning, Jan Jacobs, Jason Ragan, Jerrod Davis, Jon Wolf, Laura Wigand, Mike McNickle, Miranda Ries, Ned Therien, Rick Porso, Steve Bloomfield, Tom Bloomfield, and Vicki Bouvier.

Via tele-Conference: Andy DePaola, Corinne Story, Lisa Bishop, and Randy Hatch.

Purpose

The purpose of the Vibrio parahaemolyticus Advisory Committee (VpAC) is to work with the Department of Health to provide recommendations for consideration in future rule making regarding the Vibrio control plan set forth in WAC 246-282-006. The Department of Health will draft rule language that will be provided to the State Board of Health for review. The State Board of Health has the responsibility of approving any changes or modifications to the WAC, which may or may not include recommendations put forth by the committee.

Meeting Notes

Procedural:

- Main purpose of this meeting was to review the proposed draft language and discuss areas where clarifications or revisions are needed.

Proposed Draft Language general comments:

- Need to consider revising the growing area boundaries, some are too large—need to work on divisions and financing
    - Not within the scope of this group, a topic with Growing Areas rather than Vibrio management
- Should schedule a Landings Solutions Committee meeting, Miranda has agreed to Chair the Committee
- If oysters are refrigerated or iced prior to wet storage it may take more time for oysters to acclimate in wet storage
    - In 2013 NJ study it took 2 tidal cycles for oysters to begin purging after overnight refrigeration
- Need to be sure the control plan and MO are in agreement on wet storage
    - Need to address the dip and ship issue
- Continue to work on harvest limitations
    - Air temperature:
        - Air temperature at harvest may not make sense for submerged intertidal harvest, but air temperature at containerization may make sense
        - Could have air temperature at harvest for exposed intertidal, air temperature at containerization for submerged intertidal, no air temperature for subtidal
            - Air temperature is important for subtidal harvest
        - Would need a variance process for wet storage—example if it is 90F out the product is in 60F tanks, can they not harvest from wet storage tanks
            - Be sure to reconcile variance process with MO

        - Don't close based on air temperature, have more stringent TTCs
    - Tidal exposure:
        - Still problematic and challenging to see how it would function
        - How would submerged intertidal harvest work (ex. you could containerize on those days but not harvest, even though the product will still be exposed)
        - Could further ratchet down the TTC for tides or have closures
    - 48 hours
        - Need to define when the 48 hours begins and ends
        - What about a loophole where a grower takes a temperature, it is over, they don't record it or harvest, so the next day they take temperatures and it is under so they record it and harvest, should be closed based on the first temperature but there is no documentation
    - Overall
        - Combine TTC and harvest limitations, one chart with everything
            - Consider taking out the months and just base on risk categories
        - Need to keep it simple
        - Start at 63F and go up by 3 degree increments
- Need to include more definitions: ex. 48 hours
- Develop a variance process for other harvest methods
    - Ex. if you have a sprinkler on your oysters and their tissue temperatures are 60F you should be able to harvest in certain risk categories
- Still need to address the bad players
    - DOH has a new illness investigation protocol for Vp illnesses
    - Growers aren't responsible enough to do the data collection
        - DOH will spot check, growers are already responsible for taking temperatures all of the time, not realistic to implement if growers aren't responsible
        - DOH will have other tools to help with checking—more data loggers, some cell-based data loggers, hoping to work with NOAA on a predictive model
- Will growing areas be able to bounce around from level 1 to 4 to 1
    - No, based on modeled risk and illnesses
        - Model forecasts what illnesses are likely to be
        - Illnesses are the historical record of what illnesses have occurred
        - Groundtruth/complement one another
    - Will be year to year variability in risk, but areas should stabilize into categories that work

Specific revisions and comments:

- 2: new definitions are much clearer
- 4(c): revise so that it is clear that the plan only needs to be re-submitted if it is revised and that growers cannot harvest unless their plan is approved
    - Understand DOH need to have the information submitted/up to date for illness investigations, tracking, etc. but do not want to create unnecessary paperwork
- 7: wordsmith the categories so that it is more clear, numbers alone aren't enough but it is clear from the table what the numbers mean
- 7(c): appreciate date changes to make the process tenable for the industry and DOH
- 8: TTC should also be based on harvest practice rather than by month, combine with harvest restriction table
- 8(d): need to reconcile with MO, make sure requirements for wet storage are clear, but appreciated additional options for how to deal with product

    - Although there is no evidence that 14 days is adequate, it is likely conservative as oysters will be pumping at that time or have died if the stress was too much
- 9: combine with TTC table, use by harvest practice, need to add variance, work from combined version
- 9(a): at depth of harvest is a much more stable temperature and relevant for this purpose
- 10: reconcile with MO, add a requirement that the record include what category the harvest area is in (so 2nd dealer knows remaining time to get product to 50F)

2014 temperature collection:

- DOH received Partnership funds from FDA to purchase 3 cellular data loggers, need to place them:
    - Uses ART&T service which may be a limitation on the coast
        - Look into what other service options there may be
    - Suggested locations:
        - Little Skookum (Wallins flupsy)
        - Totten Inlet (Taylor mussel rafts)
        - Should locate: 1 coastal, 1 south sound, 1 north sound, 1 Hood Canal at least
    - Dave will have a submerged data logger at Dabob
- Put TDLs everywhere where we can get water temperature data, real time is more fun, but need as much temperature data as we can get
    - Sentinel mussel cages
    - Flupsys
- If we know the issue is the conditions and we don't have much information beyond temperature to differentiate growing areas, why create the sub system, just have the same triggers for everyone
    - Historical illness information may be a hint at stain virulence, or a function of other factors we don't know/can't model at this point
    - Ideally the risk categories could continue to be refined as we have more data and information
    - Should keep it simple for now, know the factors that we can work with
    - Ex. Nisqually temperatures do not reach 63F, so even if a level 4, the area would not close

Next steps:

- DOH:
    - Refine proposed draft language based on meeting
    - Work with growers on a temperature collection protocol
    - Set up meetings throughout the summer
    - Send an email on the listserv on who to contact if you see bad practices
    - Develop and send a 2013 single source illness summary
    - Include illness dates in the temperature closure graphs
    - Follow up on additional temperature sources: Teri, Sound Toxins, PSI, Jan Newton, Dick Wilson
    - Hilary: look into other service options for data loggers
- Industry members:
    - Collect temperature data—develop protocols and work out the kinks this summer
    - Miranda: convene a Landings Solutions Committee